

**Raoul Zaltzberg, Esq.**

Zaltzberg Law  
5 Penn Plaza, 23<sup>rd</sup> Floor  
New York, New York 10001

Attorney at Law

[Raoul@ZaltzbergLaw.com](mailto:Raoul@ZaltzbergLaw.com)

O: (212) 609-1344  
F: (212) 609-1345  
P: (917) 244-4322

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**REQUEST TO BE FILED UNDER SEAL**

November 15, 2022

**VIA ELECTRONIC MAIL**

Hon. P. Kevin Castel  
United States District Court Judge  
US Federal Courthouse  
500 Pearl St.  
New York, NY 10007

Re: *United States v. Diaz Morales (Juan Carlos Bonilla Valladares)*  
15 CR 379 (PKC)

Dear Hon. Judge Castel,

On May 11, 2022, I was assigned by the Honorable Katharine H. Parker to represent Mr. Juan Carlos Bonilla Valladares. Due to the severity of the charges and the voluminous amount of discovery, I would be aided by the appointment of an Associate Counsel to assist in getting the work done in a timely manner.

I am requesting, therefore, that this Court assign Bernarda Villalona, an attorney who has just finished the CJA Mentorship program in the Eastern District of New York as Associate Counsel at a rate of \$125.00 per hour (an appropriate rate as per the Second Circuit guidelines and per Alan Nelson, The CJA Budget Coordinator).

Ms. Villalona is an experienced attorney who has spent 16 years as a prosecutor before joining the defense bar in 2020. In that time, she tried numerous cases, many of which were homicide cases. Moreover, Ms. Villalona is a native and fluent Spanish speaker, which is a major asset in this matter, given that Spanish is my client's only language, and a large portion of discovery involves Spanish as well. Ms. Villalona's resume is included in this request.

We will avoid any duplication of work wherever possible, and Ms. Villalona's assignment will result in the work getting done faster and at a lower cost to the courts. I thank you in advance for your attention and courtesy in this matter.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
Raoul Zaltzberg, Esq.